

Dead Cat's Replacement

In the April issue of this magazine, I wrote an article titled "Red Tape," in which I presented to the world, the new FAA policy requiring a technician to develop instructions for continuing airworthiness (ICA) when requesting a field approval for a major alterations from the local FAA Inspector.

In the now legendary epistle, along with the new FAA's requirements, and questions and answer format, I publicly confessed that I was the sole author of the FAA's Flight Standards Information Bulletin (FSAW 98-03) that created the policy, that requires ICA. First big mistake of 1998. But being first generation tater-eating Irishman, and not one to stop at making only one big mistake, I made the unparalleled, second, colossal, bureaucratic mistake in a row, by publishing in the very same article, my telephone number and fax number where I could be reached if there were any questions on the policy. To be brief, all hell broke loose.

My phone never stopped ringing, the fax machine ground to a halt only after its one ream of paper supply ran out. Internet, and cc-mail messages concerning FSAW 98-03 filled in the rest of my day for almost three straight weeks after the FSAW and the article came out. I was being beaten up verbally, electronically, and in print on a daily basis, by FAA inspectors and technicians alike. Despite defending my self valiantly, I had moments of self doubt. I remember thinking to my self, "Could I have been this wrong? Have I lost all contact with the field? Have I been in Washington too long? Have I misread the bureaucratic tea leaves?"

Small wonder that with all the negative feedback I was being subjected to, I was beginning to feel as insecure as a saber-toothed tiger's orthodontist.

It was also during this period of trial that I noticed my fellow workers who, somehow sensed my wounded ego, began treating me as if I had a rare, incurable, social disease that they could catch if they were within 40 feet downwind of me. The Maintenance Division's coffee pot, conveniently located right outside of my door, is usually a busy area of rapier wit and politically-correct conversation, but would suddenly empty when I showed up.

Required conversations with other inspectors were short, and always were accompanied with side glances to the inspector's left or right as if to check if anyone witnessed their private dialogue with me. Whispered conversations, and finger pointing from the administrative staff, shadowed my comings and goings. Oh boy, it didn't take a Vulcan mind-meld to know, I was in big trouble. What to do? The FSAW (dead cat) was in my backyard!

The answer of course if you have a problem, is to fix it! As a technician, when I had a problem I approached it in a systematic way, using the five rules of troubleshooting I learned at Pittsburgh Institute of Aeronautics, so many years ago.

First rule, identify the problem. This is the hardest of the five rules, because it required me to sit down on my scar tissue, and objectively review the faxes, e-mail, and notes of telephone conversations that I have received. My review uncovered a central theme. Both FAA inspectors and technicians alike, said that ICA was a good idea, and it made sense to have maintenance information available to maintain a major alteration in the near and distant future, but they wanted more guidance on what constitutes an "acceptable" ICA.

The FAA inspectors wanted to be sure they did not "accept" anything less than what the new policy required when issuing a field approval, and the technicians did not want to give the FAA anything more than what the new policy required. Both parties wanted the guidance standardized. Both wanted a C.Y.A. (cover your anatomy) check list that filled in all the blanks. In other words a replacement set of instructions for my dead cat.

The second rule of troubleshooting is to list some solutions. Burying the dead cat in someone else's backyard, or ignoring the rather strong offensive odor, or taking extensive leave, didn't seem like something I could get away with easily, so they were quickly discarded.

After exploring what was left of my alternatives, and following the third rule of troubleshooting, I picked one. My solution was to create a check list on how to develop an ICA, in which both the FAA inspector and the technician had a standard to go by. To ensure that my dead cat's replacement did not go belly up and make my backyard a toxic waste dump eligible for EPA clean up super funds, I coordinated the document with FAA and industry and got their approval in writing.

The fourth rule was to implement the solution. This I have done, after extensive FAA and industry input, the check list is in the form of an FAA Handbook Bulletin for Airworthiness (HBAW-98-18) it will already be sent to the local FAA offices by the time you read this paragraph.

What follows is a paraphrasing of the seven page handbook bulletin.

Note: a copy of this handbook bulletin is available on the FAA website:

<http://www.faa.gov/avr/afs/hbaw/hbawl.htm>, or pick up a copy from your local Flight Standards District Office (FSDO).